

Department of Health Pharmacy Quality Assurance Commission Directive

Title:	Nonresident Pharmacy: List of Approved Inspection Programs
Reference:	RCW 18.64.360
Contact:	Lindsay Trant, MPP, Interim Deputy Director
Effective Date:	December 17, 2021
Supersedes:	Nonresident Pharmacy: Approved List of Recognized States
Approved:	Teri Ferreira, RPh, Pharmacy Quality Assurance Commission Chair

RCW 18.64.360(1)(b) requires a nonresident pharmacy, upon initial licensure and at renewal, to submit a copy of an inspection report that is conducted by an inspection program approved by the Pharmacy Quality Assurance Commission (Commission) as having substantially equivalent standards to those of the Commission, and that was issued within the last two years. This directive identifies those inspection programs the Commission has approved as having substantially equivalent standards to those of the Commission.

The Commission considered multiple factors when choosing whether to approve an inspection program. This includes using the National Association of Boards of Pharmacy (NABP) Multistate Pharmacy Inspection Blueprint Program criteria. The Commission also considered whether the inspection program required nonresident pharmacies who engage in compounding to comply with the minimum standards of the official United States Pharmacopeia (USP).

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Approved Inspection Programs

The Commission has approved the inspection programs of the following state boards of pharmacy (or equivalent state regulatory agency) and one third-party inspection program as having substantially equivalent standards to those of the Commission:

Alabama	Montana
Arkansas	NABP's Verified Pharmacy Program
Arizona	Nevada
California	New Hampshire
Colorado	New Jersey
Connecticut	New Mexico
Georgia	North Carolina
Idaho	North Dakota
Illinois*	Ohio
Indiana	Oklahoma
Iowa	Oregon
Kansas	Pennsylvania (inspections conducted after June 22, 2019)
Kentucky	Rhode Island
Louisiana	South Dakota
Maryland	Tennessee
Massachusetts	Texas
Michigan	Utah
Minnesota	Vermont
Mississippi	West Virginia
Missouri	Wyoming

^{*}Approved while USP 800 is not enforced in Washington (see Policy #65.2).

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Approved Inspection Programs That Do Not Meet Commission Frequency Standards

The Commission has approved the inspection programs of the following state boards of pharmacy (or equivalent state regulatory agency) as having substantially equivalent standards to those of the Commission. The Commission also understands these inspection programs do not conduct inspections every two years. Nonresident pharmacies are reminded that inspection reports submitted as part of an application or as part of the renewal process must have occurred within the last two years. So while inspection reports conducted by the following state boards of pharmacy (or equivalent state regulatory agency) are acceptable, they must have occurred within the last two years or another inspection report from an approved inspection program will need to be submitted:

Delaware	Nebraska
Maine	New York

<u>Approved Inspection Programs for Nonresident Pharmacies Who Attest They Do Not Engage in Compounding</u>

The Commission has approved the inspection programs of the following state boards of pharmacy (or equivalent state regulatory agency) as having substantially equivalent standards to those of the Commission *but only for* nonresident pharmacies who attest that they do not engage in compounding as defined in RCW 18.64.011(6). This is because the following inspection programs do not require nonresident pharmacies to comply with the minimum standards of USP when engaging in compounding.

Florida	Pennsylvania
South Carolina	Wisconsin

Inspection Programs That Have Not Been Approved by the Commission

The Commission has determined that inspections from the following state board of pharmacy (or equivalent state regulatory agency) are not substantially equivalent to those of the Commission and will not be accepted:

Alaska	

The Commission is aware the Hawaii Board of Pharmacy does not conduct inspections. Nonresident pharmacies located in Hawaii are still required to comply with <u>RCW 18.64.360(1)(b)</u> and must provide an inspection report from an approved inspection program as outlined in this Directive.

The Commission will review this Directive on an annual basis.

Need more information? See frequently asked questions.

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